

**Michigan Department of Community Health
Division of Environmental Health
Healthy Homes Section**

Instructions for Completing an EBL Environmental Investigation Report

BEFORE YOU BEGIN:

- **Find out if any prior lead testing has been done.** Ask the property owner and check the Michigan Lead Registry at michigan.gov/ismyhomeleadsafe. If testing has been done within the past year, review the report if available, within reason.
- Ensure that you have downloaded the most recent version of the EBL EI Report template. This lowers your risk of being out of compliance with Michigan's lead regulations and increases the quality of the final product.
- The EBL EI Report Template and other guidance documents that are referenced below may be found at the mi.gov/leadsafe website under "Lead Professionals" > "EBL Environmental Investigators".

OTHER REMINDERS:

- The EBL report should be mailed first-class with postal delivery confirmation or by proof of service. If practical, hand-deliver the report to the child's primary caretaker so that important messages can be reinforced verbally or via phone.
- The report must be mailed or delivered within 30 days of receiving the lab results. Both the parent/guardian and property owner are to receive the report.
- If renovation work was done on the property by a contractor over the past year, consider providing an anonymous tip to our lead enforcement officer so that a compliance investigation can be done for Michigan's Pre-Renovation Education law. The following information, that is collected during your interview, should be sent to Jim Copeland at CopelandJ3@mi.gov: 1) describe renovation activities; 2) where was work done; 3) when work was done; 4) whether the household given an information booklet; 5) contractor name/license/phone/address.
- When giving a copy of the report to anyone other than medical providers/health department staff, redact (black or white out) all child information and protected health information, including names, dates of birth, blood lead data, sibling data, child-specific behaviors, and any other information that could be used to identify your client. Section 6.0 should be redacted in its entirety, as should any applicable information in the Section 2.0 Report Summary. This complies with the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Redacting this information should also be done in response to Freedom of Information Act (FOIA) requests.

EBL EI REPORT INSTRUCTIONS:

The template has been designed to prompt the investigator for site-specific information to complete the report. Overwrite or delete all red text within the template to finalize the report. The following guidance supplements the red instructions within the template:

TABLE OF CONTENTS. Change the page numbers to match the pagination for each report. Insert the property address in the footer. Take out the template edition reference.

2.0 FINDINGS

Report Summary. See template for details.

2.1 Table of Lead-Based Paint Hazards and Recommended Corrective Actions and 2.2 Table of Lead-Based Paint Potential Hazards.

See template for details. In addition:

- An easy way to populate these two tables is to use the following steps:
 1. List all positive XRF readings in poor condition within Table 2.1 (hazard)
 2. List all positive XRF readings in intact or fair condition within Table 2.2 (potential hazard)
 3. Where a positive dust wipe is located near a positive component in intact or fair condition, the component should be moved from Table 2.2 (potential hazard) to Table 2.1 (hazard).
 4. List all positive XRF readings with intact paint and are impact or friction components in Table 2.2 (potential hazard).
 5. List all positive XRF readings with fair or poor paint and are impact or friction components in Table 2.1 (hazard).
 6. If other dust wipes are found positive, list dust as a hazard within Table 2.1 (hazard).
 7. List all positive soil samples within Table 2.1 (hazard).
- The website has a downloadable table available with a comprehensive list of housing components and standard recommendations. You can adopt these recommendations for your report to be specific to the hazards found at the property.¹
- *Severity* rates only the condition of the paint, soil, or dust hazard. Location and accessibility are not factors.
- *Priority* is a numerical rating to indicate what needs to be done first. This is where accessibility and location are factored in. Sometimes a hazard that is very severe is not a priority due to its location or child inaccessibility. Conversely, a somewhat less severe hazard could be a very high priority due to its location and child accessibility. *Severity* and *priority* are determined relative to the property based on your professional judgment.
- Per recent HUD guidance, bathtubs and sinks should be listed under “personal property” and not under “hazards”. These items may still be listed as potential hazards.

2.3 Dust wipe sample results². See template for instructions. In addition:

- Copies of the laboratory results do not need to be included.
- If dust wipes cannot be taken (inaccessibility, occupant refusal, etc.), document the reasons in Section 3.0 - Report Limitations.
- Add or eliminate rows as needed.
- Be sure that room numbers and names match the floor plan included in the report.
- If testing components other than floor, window sill, or window trough, be specific as to what component was tested.

¹ Refer to: Table of Recommended Corrective Actions for identified lead hazards, available on website.

² Refer to: MDCH Lead Laboratory’s Dust Wipe and Soil Sampling Procedures, available on website.

- Do not list personal property that is tested. These items should be listed separately in 2.6- Personal Property Testing Results.

2.4 Soil Sample Results². See template for instructions. Note that if soil samples were not collected due to snow cover, soil samples should be collected as soon as weather permits. A separate soil report should be sent as an addendum to this report.

2.5 XRF Readings. See template for instructions. In addition:

- Include building component testing only and permanent features (i.e. registers, etc.)
- Include XRF calibration readings in the tables. Three calibration readings must be taken when the XRF is turned on, every 4 hours during operation, and before it is turned off. Any XRF tables that are not bracketed by calibration readings are considered incomplete.
- Paint condition should only be characterized as intact, fair, or poor.³
- Reported results should be positive or negative. “Null” readings indicate that the XRF was removed from the tested component before the test was complete. “Inconclusive” results indicate that the lead level on the painted surface is in a range that the XRF is unable to quantify (certain machines do this). “Null” readings may be removed if the component later tested with a conclusive positive or negative reading. “Inconclusive” readings must be left in the report. Any component without a conclusive reading should be presumed positive.

2.6 Personal Property Testing Results. See template for instructions. Please note that positive and negative XRF results for personal property should reflect a 0.1 mg/cm² threshold rather than 1.0 mg/cm². You may need to change the positive/negative status manually in the table. As noted above, bathtubs and sinks should be included under this section.

3.0 REPORT LIMITATIONS. See template for instructions.

4.0 SITE DESCRIPTION. See template for instructions. Note that date of construction is required by law. Check with the local property and tax assessor for the date on record.

5.0 BUILDING CONDITION FORM. See template for instructions. Note that some items may be answered from the investigator’s own visual observation. Others should be asked of the caregiver being interviewed.

6.0 HOUSEHOLD INTERVIEW. These questions should be asked of the caregiver at the home. You may allow the caregiver to read along; however, do not allow them to fill out the questionnaire on their own, as reading comprehension can make answers inaccurate.

7.0 FLOOR PLAN. See template for instructions. Remove red text before finalizing.

7.1 SITE PLAN. See template for instructions. If the 2.1 Table of Hazard Recommendations includes soil remediation, be sure to designate their locations on the site plan. Remove red text before finalizing.

7.2. SITE MAP. See template for instructions. Remove red text before finalizing.

³ Refer to: Lead-Based Paint Condition Identification tutorial, available on website.

8.0/8.1. APPLICABLE FEDERAL/STATE REGULATIONS AND LOCAL ORDINANCES. Keep the provided text. If there is a local city or county ‘lead in housing’ ordinance that affects the property owner of this address, insert the language of the ordinance and legal references (e.g., housing code number, etc.).

9.0 ONGOING MONITORING SCHEDULE. Keep the provided text.

10.0 CERTIFICATIONS. The EBL Investigator(s) must sign. This certifies that the Investigator is responsible for the report content.

11.0 PHOTOGRAPHS. See template for instructions.

12.0 HOUSING COMPONENT IDENTIFICATION. Include these pages in the report, in addition to the cleaning guide for paint chips and lead dust.